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14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 LEPRINO FOODS COMPANY;  
17 LEPRINO FOODS HEALTH &  
18 WELFARE PLAN,

19 Plaintiffs,

20 v.

21 AVANI OUTPATIENT SURGICAL  
22 CENTER, INC., a California  
23 Corporation; MOUNTAIN VIEW  
24 SURGICAL CENTER, INC., a  
25 California Corporation; THE  
26 CENTER FOR SURGERY AT  
27 BEDFORD, LLC, a California limited  
28 liability company; AMY ZARAGOZA,  
an individual; BABEK  
MOEINOLMOLKI, an individual;  
BENHAM KASHANCHI, an  
individual; SAMUEL KASHANI, an  
individual; SHERVIN AMINPOUR,  
an individual; RALPH MAYER, an  
individual; MICHAEL YADEGARI, an  
individual; KARAPET  
DERMENDJIAN, an individual;  
SEPEHR LALEZARI, an individual;  
MARIO ROSENBERG, an individual;  
PEYMAN SOLIEMANZADEH, an  
individual; and DOES 1-30,

Defendants.

Case No. 2:22-cv-07434 DSF (JC)  
Assigned to Judge Dale S. Fischer.  
Courtroom 7D

**REQUEST FOR ENTRY OF  
DEFAULT AGAINST DEFENDANT  
CRISTINA LUZ PERRYMAN**

*Filed concurrently with Declaration  
of Katherine A. Bowles*

Action Filed: October 12, 2022  
Trial Date: August 13, 2024

**AND RELATED COUNTERCLAIMS.**

1 **ATTENTION CLERK OF THE ABOVE-ENTITLED COURT:**

2 Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs LEPRINO  
3 FOODS COMPANY and LEPRINO FOODS HEALTH & WELFARE PLAN  
4 (collectively "Leprino") request that the Clerk of the above-entitled Court  
5 enter default in this matter against defendant CRISTINA LUZ PERRYMAN  
6 ("Perryman" or "Defendant") on the grounds that said Defendant has failed  
7 to appear or otherwise respond to the operative complaint within the time  
8 prescribed by the Federal Rules of Civil Procedure.

9 Leprino served the Third Amended Complaint (Dkt. 251, the  
10 "Operative Complaint") on Perryman on October 8, 2023, as evidenced by  
11 the proof of service of summons filed in this Court on October 13, 2023 (Dkt.  
12 271). To date, no response to the Operative Complaint has been filed by  
13 Perryman and the time for filing this response has now expired.

14 The above-stated facts are set forth in the accompanying Declaration  
15 of Katherine A. Bowles, filed herewith.

16

17 DATED: November 8, 2023

HANSON BRIDGETT LLP

18

By:

19   
KATHERINE A. BOWLES  
20 ROBERT G. DAVIS  
21 STELLA PADILLA  
22 Attorneys for Leprino Foods Company,  
Leprino Foods Health & Welfare Plan

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# PROOF OF SERVICE

# Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

**U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)**

# STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017.

On November 9, 2023, I served true copies of the following document(s) described as **REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT CRISTINA LUZ PERRYMAN** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

**BY HAND DELIVERY:** I caused such envelope(s) to be delivered by hand to the office of the addressee(s).

**Cristina Luz Perryman  
2256 Pleasant Court  
Hanford, CA 93230**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 9, 2023, at Los Angeles, California.

/S/ Silvia Abrignani  
Silvia Abrignani

1 **SERVICE LIST**

2 **Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et  
al.**

3 **U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)**

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51 [Note: Updated April 2023]

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